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Puget Sound Clean Air Agency

Stack Test Evaluation

Puget Sound Clean Air Agency
Compliance Department

Reg #:	11656 - 640	Routed:	Engineer	GSP	Inspector	TJH	Supervisor	MAP	Planner	RGB
Date Received:	04/04/2011	Reviewed:		04/07/2011		04/18/2011		04/18/2011		04/19/2011

☑ Received Paper Copy

Facility: **Ardagh Glass**

Address: **5801 E Marginal Way S**
Seattle, WA 98134

Date Received: **04/04/2011**

Date Evaluated: **04/07/2011**

Test Date: **02/08/2011**

Test Results: ☑ **Passed** ☐ **Failed**

Date Observed: **02/08/2011**

Pollutant Tested: **7440-47-3 - Chromium and compounds**

Emission Unit Tested: **Glass Melting Furnace No. 3**

NOV / WW #:

Message on Information Request:

Review:

This is a stack test report for furnace 3 to determine compliance with the MACT standard of 0.02 lb/ton of glass produced under 40 CFR 63.11451. The electronic report was received on 4/4/11, followed by the hard copy on 4/6/11. The report was due within 60 days of the test (by 4/29/11).

Furnace 3 was previously tested on 6/9/09 and was found to be emitting 0.002 lb/ton of antique green glass, a factor of 10 below the standard. Chromium (iron chromite) is the only metal HAP added to the glass and it produces the green color. Champagne green contains about 6 times more iron chromite than antique green. Because the test has to be conducted while the furnace is operating at its maximum production rate per 63.11452(b)(3), Saint-Gobain repeated the test on 2/8/11. This is the first time the furnace has produced champagne green since the MACT compliance date of 12/26/09.

A copy of the test plan was received by the Agency on 1/5/11, only 34 days in advance of the test. Saint-Gobain requested that the 60 day notification required under 40 CFR 63.7(b) be waived because of the logistical issues of forecasting the production 60 days out. I responded stating that the NESHAP contains no waiver provisions for this requirement but that we had no objection to the test being conducted on 2/8/11. The correspondence is included in the final appendix of the test report.

Furnace 3 was found to be emitting 0.0066 lb of chromium per ton of champagne green glass produced, which is a factor of 3 below the limit. Virtually all of the chromium measured by Method 29 was filterable. The pull rate during the test was 8.18 ton/hr, which is consistent with previous tests. Although Method 29 enables simultaneous measurement of PM and metal emissions, the PM emissions weren't quantified. Therefore, I can't tell how representative this test was in terms of particulate emissions.

Since the furnace has no control equipment, no monitoring is required under 63.11454 and continuous compliance can be demonstrated by satisfying the recordkeeping requirements under 63.11457, which appear to include only paragraphs (a)(1), (a)(4), (b), (c) and (d).

I reviewed Engineer Pade's report. No violations were determined. - TJH